

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**NOTICE OF MOTION TO ADMIT COUNSEL PRO HAC VICE**

TO: BOUNDAS, SKARZYNSKI, WALSH & BLACK, LLC  
One Battery Park Plaza, 32<sup>nd</sup> Floor  
New York, NY 10004

CLEARY GOTTLIEB STEEN & HAMILTON  
Lewis J. Liman, Esq.  
Michelle Kenney, Esq.  
Matthew M. Bunda, Esq.  
Chris Paton, Esq.  
One Liberty Plaza

REARDON GOLINKIN & REED  
Scott O. Reed  
111 W. Washington St., Suite 707  
Chicago, IL 60602

NIXON PEABODY  
Harold J. Ruvoldt, Esq.  
Ronald J. Hedges, Esq.  
Christine M. Riley, Esq.  
437 Madison Avenue  
New York, NY 10002

LANKLER SIFFERT & WOHL LLP  
John S. Siffert, Esq.  
Joseph Patrice, Esq.  
5000 Fifth Avenue, 33<sup>rd</sup> Floor  
New York, NY 10100

PLEASE TAKE NOTICE that, upon the annexed Affidavit in support of this motion and the Certificate of Good Standing annexed thereto, we will move this Court before the Honorable Richard M. Berman at the United States District Courthouse for the Southern District of New York, pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an Order allowing the admission of Robert L. Hickok, a member of the law firm of Pepper Hamilton LLP and a member in good standing of the Bars of the Commonwealth of Pennsylvania, State of New Jersey and the District of Columbia, as attorney to the bar of this Court *pro hac vice* to argue or try this case in whole or in part as counsel. There are no pending disciplinary proceedings against Mr. Hickok in any state or federal court.

Dated: New York, New York  
January 17, 2008

Respectfully submitted,



\_\_\_\_\_  
Kenneth J. King (KK 3567)  
PEPPER HAMILTON LLP  
The New York Times Building  
620 Eighth Avenue  
New York, NY 10018-1405  
kingk@pepperlaw.com  
(212) 808-2700

Attorneys for Plaintiff  
Great American Insurance Company

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
GREAT AMERICAN INSURANCE : CIVIL ACTION  
COMPANY, :  
: Plaintiff, :  
v. : NO. 07-CIV-6498  
: :  
: MARTIN L. SOLOMON, EDWIN W. ELDER, :  
WILLIAM J. BARRETT, WILLIAM J. :  
THOMAS, JR., JOHN A. DORE, AND KARLA :  
VIOLETTA, KINGSWAY FINANCIAL :  
SERVICES, INC., and AMERICAN CENTURY :  
HOLDINGS, INC., :  
: Defendants. :  
-----X

**AFFIDAVIT OF KENNETH J. KING  
IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE***

STATE OF NEW YORK )  
 ) ss:  
COUNTY OF NEW YORK )

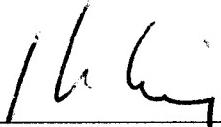
KENNETH J. KING, being duly sworn, hereby deposes and says as follows:

1. I am an attorney admitted to practice in the State of New York. I am a partner with the law firm of Pepper Hamilton LLP, counsel for defendants in the above-captioned matter.
2. I make this Affidavit in support of the motion for the admission of Robert L. Hickok to practice *pro hac vice* in the above-captioned matter.
3. Mr. Hickok is a partner with the law firm of Pepper Hamilton LLP. As shown in the Certificate of Good Standing annexed hereto, Mr. Hickok is a member in good standing of the Bars of the Commonwealth of Pennsylvania, the State of New Jersey, and the District of Columbia.

4. There are no pending disciplinary proceedings against Mr. Hickok in any State or Federal court.

5. It is respectfully requested that the Court grant the motion for an order permitting Robert L. Hickok to appear in this action as counsel for defendants for all purposes *pro hac vice*. A proposed order for Mr. Hickok's admission *pro hac vice* is appended hereto.

Dated: New York, New York  
January 17, 2008

  
Kenneth J. King (KK 3567)

Sworn to before me this  
17<sup>th</sup> day of January, 2008

  
\_\_\_\_\_  
Notary Public

MICHAEL PALUZ  
Notary Public, State of New York  
No. CIP-A6133474  
Qualified in Westchester County  
Commission Expires 9/19/2023

# Supreme Court of New Jersey



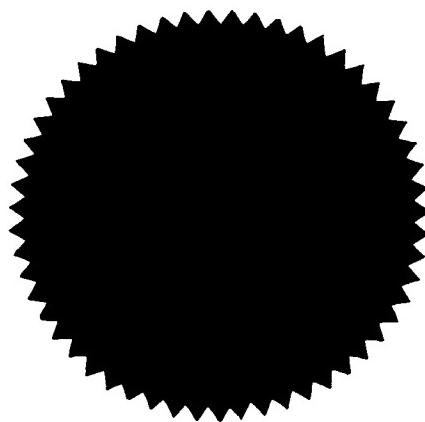
## Certificate of Good Standing

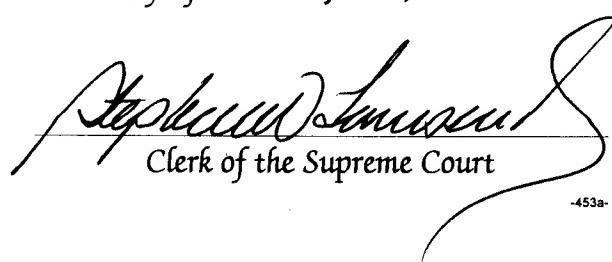
This is to certify that **ROBERT LYMAN HICKOK**  
(No. **003401995**) was constituted and appointed an Attorney at Law of New Jersey on **May 31, 1995** and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.

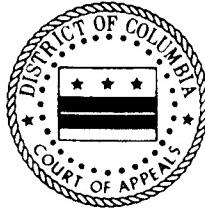
I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.*

In testimony whereof, I have hereunto set my hand and affixed the Seal of the Supreme Court, at Trenton, this 9TH day of January , 20 08



  
Stephen J. Munzer  
Clerk of the Supreme Court



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D.C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia  
Court of Appeals, do hereby certify that

ROBERT L. HICKOK

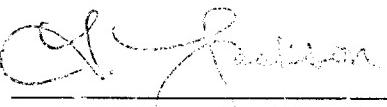
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was on the 17<sup>TH</sup> day of JULY, 1981

duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on  
December 20, 2007.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk



Supreme Court of Pennsylvania

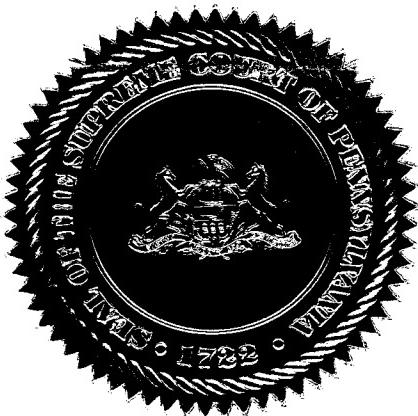
**CERTIFICATE OF GOOD STANDING**

***Robert L. Hickok, Esq.***

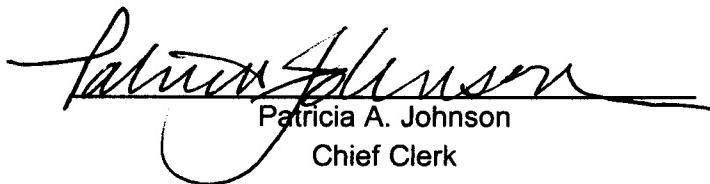
**DATE OF ADMISSION**

***October 15, 1979***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal  
Dated: January 4, 2008**

  
\_\_\_\_\_  
Patricia A. Johnson  
Chief Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X		
GREAT AMERICAN INSURANCE	:	CIVIL ACTION
COMPANY,	:	
	:	
Plaintiff,	:	
v.	:	NO. 07-CIV-6498
	:	
	:	
MARTIN L. SOLOMON, EDWIN W. ELDER,	:	
WILLIAM J. BARRETT, WILLIAM J.	:	
THOMAS, JR., JOHN A. DORE, AND KARLA	:	
VIOLETTO, KINGSWAY FINANCIAL	:	
SERVICES, INC., and AMERICAN CENTURY	:	
HOLDINGS, INC.,	:	
	:	
Defendants.	:	
-----X		

**ORDER GRANTING ADMISSION TO PRACTICE PRO HAC VICE**

The motion for admission to practice *pro hac vice* in the above-captioned matter is GRANTED. The admitted attorney, Robert L. Hickok, is permitted to argue or try this particular case in whole or in part as counsel or advocate.

An attorney admitted to practice *pro hac vice* is required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fee.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission *pro hac vice* for the above listed case will be made on the roll of attorneys.

The attorney admitted *pro hac vice* must serve a copy of this Order on all other counsel in this case.

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Robert M. Berman  
United States District Judge

Dated:  
cc: Robert L. Hickok  
Court File

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X		
GREAT AMERICAN INSURANCE	:	CIVIL ACTION
COMPANY,	:	
	:	
Plaintiff,	:	
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THOMAS, JR., JOHN A. DORE, AND KARLA	:	
VIOLETTO, KINGSWAY FINANCIAL	:	
SERVICES, INC., and AMERICAN CENTURY	:	
HOLDINGS, INC.,	:	
	:	
Defendants.	:	
-----X		
STATE OF NEW YORK )		
	)ss.:	
COUNTY OF NEW YORK )		

The undersigned, being duly sworn, deposes and says that he is over the age of 18 years, and is not a party to this action.

That, on the 17<sup>th</sup> day of January, 2008, he caused to be served the within NOTICE OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*, AFFIDAVIT OF ROBERT L. HICKOK IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*, and the AFFIDAVIT OF KENNETH J. KING IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*, by first class mail upon:

BOUNDAS, SKARZYNSKI, WALSH & BLACK, LLC One Battery Park Plaza, 32 <sup>nd</sup> Floor New York, NY 10004	CLEARY GOTTLIEB STEEN & HAMILTON Lewis J. Liman, Esq. Michelle Kenney, Esq. Matthew M. Bunda, Esq. Chris Paton, Esq. One Liberty Plaza New York, NY 10006-1470
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REARDON GOLINKIN & REED  
Scott O. Reed  
111 W. Washington St., Suite 707  
Chicago, IL 60602

LANKLER SIFFERT & WOHL LLP  
John S. Siffert, Esq.  
Joseph Patrice, Esq.  
5000 Fifth Avenue, 33<sup>rd</sup> Floor  
New York, NY 10100

NIXON PEABODY  
Harold J. Ruvoldt, Esq.  
Ronald J. Hedges, Esq.  
Christine M. Riley, Esq.  
437 Madison Avenue  
New York, NY 10002

the addresses having been designated by said attorneys for that purpose, by depositing a true copy of same, securely enclosed in a postpaid properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Postal Service.

  
\_\_\_\_\_  
Michael Palitz

Sworn to before me this  
17th day of January, 2008



Notary Public

MARIE A. RAMOS  
NOTARY PUBLIC, State of New York  
No. 01RA5038297  
Qualified in Bronx County  
Certificate Filed in New York County  
Commission Expires Jan. 23, 2011